

1 9 9 8 STATE FISCAL YEAR

***P*ERFORMANCE
*P*ARTNERSHIP
*A*GREEMENT**

Between

**OREGON
DEPARTMENT OF ENVIRONMENTAL QUALITY**

&

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

**APPENDIX A - AIR PROGRAM PARTNERSHIP
PLAN**

**AIR QUALITY PROGRAM
PARTNERSHIP PLAN
JULY 1, 1997 THROUGH JUNE 30, 1998**

OBJECTIVES 1 AND 2: Identify non-attainment areas in the state and achieve compliance with NAAQS, AND to identify areas of state with potential AQ problems and undertake preventative and corrective measures.

Objectives 1 and 2 have been grouped together because the tactics and activities required to achieve them are the same. Objective 1 has been and will continue to be the main focus of much of the AQ program. It consists of characterizing air quality for criteria pollutants where we identify problems and maintaining air quality once we demonstrate attainment. Objective 1 relates to the air quality program goal of "Protect Oregonians". Objective 2 is intended to catalogue and characterize existing air quality problems or potential air quality problems outside of existing attainment areas. Objective 2 relates to the air quality program goal of "High quality Oregon air".

TACTIC	DEQ ACTIVITY	EPA ACTIVITY	OUTCOME/ OUTPUT	DUE DATE
A. Characterize air quality problems in all areas of the state.	Network Validation Assessment		Networks validated	Periodically
			Annual network validation report	Annually
	Criteria pollutant monitoring		Criteria pollutant monitoring data ¹	Ongoing
			Updated data to AIRS ¹	Quarterly

¹Items used to evaluate National Core Performance measures for Air Quality.

	Enhance monitoring network to address new federal standards (PM2.5 & Ozone)	Communicate final standard.	Continue interim strategy to expand PM2.5 data using nephelometry	Ongoing
			Deploy PM2.5 monitors as necessary.	Fall 1997
	SIP related monitoring, e.g. Meteorological, NOX, NMOC measurements		SIP support data collected & validated.	Ongoing
	SIP Support Monitoring e.g., local smoke and met. Measurements provided to local communities for control purposes		Data available for local smoke control efforts.	Seasonal
	Monitoring done to prevent the development of non-attainment conditions, in at-risk areas		Data collected and available for local prevention information/ed. efforts	Seasonal
	Data QA/QC monitor performance testing		AQM data quality audited, performance documented, reported to EPA quarterly.	Quarterly
	Investigate air quality in areas outside existing monitoring network that may be of concern (pollution assessment studies)		Test and assess AQ in all of Oregon, report on areas surveyed, findings.	As resources allow
			Track and evaluate growth and development trends.	As resources allow

B. Choose strategies to develop attainment maintenance and prevention program (using team approach).	Use the results of tactic A to put together a strategy of ongoing planning tasks	Provide input if requested; keep ODEQ informed about new NAAQS, policy, etc.	Develop strategy to improve air quality in individual attainment and nonattainment areas.	Ongoing
		Provide technical support & guidance as needed.		
	Conduct modeling as needed to support SIP, attainment, and maintenance plan development.	Provide technical support & guidance as needed.	Technically supportable modeling analysis	Ongoing
	Maintain existing emission inventory (point source)		Technically supportable emission inventory.	
			Submit annual Title V source EI.	June 30, 1998
	Update statewide and area specific emission inventories (point and area)		Initiate and work on annualized statewide emissions estimates from mobile and area sources.	Ongoing
	Develop attainment plans starting with Medford PM10		Work with advisory committee to develop approvable SIP. Submit to EPA. ²	As resources allow
	Develop maintenance plans starting with Medford CO and PM10, and Salem CO		Complete Technical Analysis Protocol for Salem CO plan. Establish advisory committee. ²	January 1998

²Items used to evaluate National Core Performance measures for Air Quality.

	Work with EPA to prioritize and complete EPA actions on SIP submittals such as Lakeview and Oakridge PM10 SIPs and the hardboard rule revision	Process actions on: Hardboard rule (1st Q) Lakeview SIP (2nd Q), Oakridge SIP (3rd Q) Appropriate FR Notices.	Work EPA to facilitate approval of submitted SIP's. ²	January 1998
	DEQ to process LRAPA SIP submittals in a timely fashion	Process SIP's submitted in a timely fashion.	Process LRAPA submittals within 180 days.	Ongoing
	Track and report on SIP commitments and Clean Air Act requirements (RFPs, periodic inventories)	Review reports, inventories, etc.	Submit PM10, RFP, OTR reports.	Dec. 1997
			Do periodic EI updates.	May 1998
			Ensure Portland plans are being implemented.	Ongoing
C. Carry out point source program	Carry out the Title V program: permitting (new, existing,, mods), source specific modeling, technical assistance, permit preparation and assistance, specific project requirements (NSR/PSD, NSPS applicability, MACT standards, NOA, etc)	Review Title V applications for enforceability and completeness.	Initial issuance of TV permits.	Jan. 1998
		Review and comment on draft permits and revisions during the public comment period. Provide timely guidance and assistance.	Maintain plume reader training and recertification.	Fall 1997 and Spring 1998
			Provide technical assistance/audit of PSD self monitoring ambient networks	As needed

		Submit required program elements milestones for tracking operating permits (TitleV) to AIRS.	Encourage and track pollution prevention.	Ongoing
	Carry out the ACDP/Synthetic minor permitting program: Permitting, source specific modeling, technical assistance, permit preparation and assistance, specific project requirements (NSR/PSD, NSPS applicability, MACT standards, NC, etc)		Maintain/reduce permit backlog.	Ongoing
		Evaluate some synthetic minor permits.	Improve enforceability of SM permits.	June 1998
		Maintain the MACTRAX database, send data to DEQ for updating.	Update MACTRAX database.	Dec. 1997 June 1998
	Look for and carry out permitting program efficiencies		Identify options for permit streamlining, encourage pollution prevention through streamlining options.	Dec. 1997
	Update/add point source rules as EPA promulgates (NSR/PSD, PSEL, Part 70, NSPS, PM2.5, CAM, etc.)	Process approval of 12/95 NSPS delegation request.	Determine status of NSPS delegations and update if necessary.	Dec. 1997
		Provide DEQ with copies of new and revised federal regulations.		
	Develop NSPS implementation plan with EPA Region 10.	Work with DEQ to develop an NSPS implementation plan.	Draft NSPS implementation plan.	June 1998
	Once federal rules are adopted, obtain delegation or approval from EPA	Expediently process TV program, SIP revisions and section 112(l) submittals and NSPS delegation requests.	Adopt changes upon EPA adoption.	Ongoing.

	Carry out minor new source review program (NOA, NC)		Revise/streamline Notice of Construction rule.	June 1997
	Update and implement Title V program agreement	Provide guidance and assistance as requested.	Revise agreement	6/30/97
	Work to resolve standing issue	EPA ORC to discuss adequacy of OAR's with ORDOJ. Consult with DOJ on remedy/potential legislation for '99 session.	Work with ORDOJ to track related legislation. Propose remedy if not addressed by legislation.	Ongoing
D. Carry out area source program	Implement consumer/commercial products programs in the Portland area		Continue technical assistance and compliance inspections.	Ongoing
	Implement Stage I in Portland, Medford and Salem Implement Stage II in Portland Area.		Respond to Stage I and II complaints, spot check inspections for compliance.	Ongoing
	Carry out public education programs statewide		Encourage and track pollution prevention.	Ongoing
	Continue support for local government woodstove curtailment programs (funding, training, etc)		Special project funding to local government woodstove curtailment programs.	Fall 1997
	Encourage ODOT and local governments to continue road dust removal program.		Meet with ODOT regions to follow up on road dust removal.	As needed.
	Consult with federal agencies making general conformity findings on major federal projects.		Review general conformity findings by federal agencies.	Ongoing.

	Update area source rules as appropriate		Evaluate and draft area source rules for Medford PM10 SIP if necessary.	May '98
E. Carry out mobile source program	Carry out existing VIP program in Portland and Medford		Test all vehicles registered inside inspection boundaries and presented for testing in existing and enhanced VIP programs.	Ongoing Jan. 1, 1998
	Carry out enhanced VIP program for Portland		For 1% of all vehicles provide BAR31/IM240 comparison test.	Jan. 1998
	Implement ECO program in the Portland area.		Provide technical assistance and compliance verification for businesses required to have commute trip reduction programs in place.	Jan. 1998
	Implement Voluntary parking ratio program in the Portland area.		Provide technical assistance on parking ratio options for businesses.	Ongoing
	Participate in interagency transportation planning process to implement transportation conformity rules.		Ensure that transportation plans are consistent with the SIP.	Ongoing
	Conduct conformity program statewide		Revise transportation conformity rules.	Spring '98

F. Implement compliance and enforcement programs	Carry out compliance and enforcement actions for permitted sources: verify compliance or noncompliance, prepare referrals, calculate penalties, negotiate settlements, issue enforcement actions, hold contested case hearings.	Conduct oversight activities on delegated or approved programs to ensure adequacy of compliance and enforcement programs (e.g., oversight inspections, audit/file reviews)	Implement the Compliance Assurance Agreement, including the inspection matrix and monthly SV updates.	Ongoing
			Provide EPA with a yearly inspection schedule.	Jan. 1998
		Track and maintain in AIRS the Significant Violators and their status (Day 0, Day Addressed, and Day Resolved)	Encourage pollution prevention through compliance actions.	Ongoing
		Adhere to the EPA/State Agreement on Compliance Assurance Principles.	Adhere to the EPA/State Agreement on Compliance Assurance Principles.	Ongoing
	Carry out compliance and enforcement actions for other regulated programs: ECO, conformity, VIP, State I/II programs, etc.		Implement DEQ's Enforcement Guidance in response to violations as detected.	Ongoing
	Carry out compliance assistance programs, including SBAP		See Objective 3, Tactic E.	Ongoing
	Update and implement the compliance assurance agreement	Update the compliance assurance agreement.	Update the compliance assurance agreement.	July 1997
	Improve coordination with EPA	Improve coordination with DEQ.	Meet in person with corresponding EPA staff to plan and coordinate work.	Ongoing

	Work with EPA to identify and implement national and regional priorities	Work with DEQ to identify and implement national and regional priorities, e.g. through State participation in drafting of OECA MOA for Region X.	Participate in drafting of OECA MOA for Region 10	Summer/Fall 1997.
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Objective 3: Increase public involvement in and public awareness of Air Quality programs				
This objective emphasizes how we get people to understand and accept their responsibility for maintaining Oregon's air quality. This objective i goals: "Healthy, clean breathable air for all Oregonians" and " High visibility and no degradation in Oregon air quality".				
TACTIC	DEQ ACTIVITY	EPA ACTIVITY	OUTCOME/ OUTPUT	DUE DATE
A. Implement advertising and outreach about air quality values.	Assess public attitudes about AQ and DEQ		Develop survey, identify target groups.	12/31/97 3/31/98 mail
	Provide information about AQ values and DEQ programs.	Assist/Coordinate national/regional Air outreach initiatives with DEQ (e.g., WA PSA project, EPA-HQ, etc)	ID target groups based on survey, explain basis of values.	6/30/98
			Produce PSA's.	Summer 1998
			Develop and print information on AQ programs and health effects of air pollution, also paid ads.	January 1998

B. Inform the public about how to get involved in influencing AQ program development & implementation	Improve access to information.	Work with DEQ to promote opportunities for OR public involvement in national rulemaking re: new NAAQS implementation, etc.	Foster public interest in local AQ by coordinating volunteer monitoring efforts.	Ongoing
	Develop and implement ways for the public to get more involved in AQ regulation.		Update website, develop structure to involve stakeholders before permit hearing date.	June 1998
			Establish advisory committees for SIP's and standing advisory committee.	Ongoing
			Evaluate options to help public become more involved in program development.	June 1998
	Make a greater effort to inform the public about AQ requirements.		Hold public meetings in Medford.	November 1997
C. Target education programs to influence behaviors to reduce emissions.	Implement CAA days intermittent control strategies and seasonal control programs in the Portland area.	Assist DEQ with informing general public, industry groups and other target audiences re: new NAAQS requirements, other important issues, as appropriate.	Clean Air Action day announcements to employers. Recruit new employers. Expand to other emissions sources. Partner with businesses and local governments to develop quantifiable incentive programs.	Summer 1997

	Develop and implement additional voluntary control days and education programs in other areas of the state.		Identify new voluntary controls that are feasible in Portland.	June 30, 1997
			Identify possible voluntary industry/individual actions on specific area/pollutant basis.	June 1998
	Partner with businesses, local governments and the public to carry out specific air quality information campaigns.		Promote the Green Permits Project to encourage reductions beyond compliance.	Ongoing
D. Be responsive to public requests for information.	Prepare informational materials.		Brochures, signs, ozone mapping technology.	Ongoing
	Respond to public information requests.	Respond to public requests for information on Oregon AQ; consult with DEQ staff and refer requests to DEQ as appropriate.	Respond to requests for information within 48 hours, if information is readily available.	Ongoing
	Make understandable scientific/technical information available to the public.		Publish annual air quality report.	Annual
E. Promote emission reductions through point source technical assistance and outreach.	Provide regulatory compliance assistance.		Facilitate workshops as new standards are promulgated. Plan and carry out a pilot outreach effort statewide for one industry sector.	Report March 1998

	Provide small business assistance.		SBAP assistance provided as requested. SBAP report to EPA	Feb. 1998
			Promote pollution prevention tax credit.	
	Provide emission reduction assistance, site audits, and advice on pollution prevention.	Assist DEQ as appropriate with technical assistance/outreach to small business on NAAQS and other issues.	Track emission reductions resulting from pollution prevention activities.	Ongoing
	Support Pollution Prevention Resource Center as information resource.		Provide some funding through 105 grant.	July 1997
F. Encourage other agencies to take actions that are beneficial to AQ (e.g. Land use, transportation)	Participate in local and state government land use and transportation planning.		Review conformity determinations.	Ongoing
			Regional participation in MPO, ODOT transportation planning process (technical advisory committees)	Ongoing
	Coordinate AQ public educational efforts and emission reduction efforts (e.g.. Smoke and dust reduction) with Department of Forestry, Agriculture, State Fire Marshall, OSHA, etc..	Coordinate region-wide education efforts to reduce smoke and dust among DEQ and other NW state/federal agencies (e.g., via Wildfire/Prescribed Burning Policies, Ag Dust controls, new NAAQS implementation, etc)	AQM data collection interests shared with USFS, NPS, OR Dept. Of Forestry, OR Dept. Ag.	Ongoing

G. Provide teacher training.	Carry out "Teach the teacher"	Assist DEQ efforts as requested (e.g., provide curriculum packages, etc)	Secure adequate, stable funding source for teacher training twice annually.	Ongoing
H. Provide educational opportunities at DEQ through internship and mentor programs.	Hire interns where possible.	Assist DEQ efforts as requested	Assign intern position development to specific staff person, coordinate hiring of interns.	Ongoing
	Develop a mentor program and hire interns where possible.		Coordinate efforts with statewide mentor ship program.	Ongoing
I. Improve internal education and act as role models.	Hold regular staff forums for discussion/education information sharing.	Assist DEQ efforts, as requested	Hold quarterly division meetings, informal forums to periodically update staff on AQ activities.	Quarterly Ongoing
	Provide incentives for staff to reduce emissions.		Involve staff in external agency activities which improve air quality.	Ongoing

Objective 4: Reduce emissions and public health risks from non-criteria pollutants.

This objective addresses non-criteria emissions including hazardous air pollutants as identified in the federal Clean Air Act and other toxic pollut criteria pollutants or the 188 HAP's. This objective relates to the air quality program goal of "Healthy, clean, breathable air for all Oregonians."

TACTIC	DEQ ACTIVITY	EPA ACTIVITY	OUTPUT/ OUTCOME	DUE DATE
A. Monitor & characterize ambient HAP levels in Oregon.	Conduct monitoring and sampling studies of HAP's.		No output for FY 98.	
	Conduct HAP modeling studies and carry out other data analysis.		HAP hot spot monitoring data.	As needed

	Identify HAP areas of concern or at-risk areas/sites.		Develop a list of potential problem areas to monitor or sample.	Dec. 1997
B. Inventory HAP and other noncriteria emissions and their sources.	Develop a list of HAP's & source categories to develop emission information.		Accept EPA lists in FY98.	June 1998
	Develop a point source emission inventory for HAP's and other noncriteria pollutants.		Initiate emission information collection from all Title V permitted sources.	June 1998
			Initiate emission information collection from on TV sources.	June 1998
	Develop area and mobile source emission inventories for HAP's and other noncriteria pollutants.	Process state's funding request for area and mobile source emissions inventory update.	No output in FY98.	
C. Identify sources subject to state or federal noncriteria requirements.	Identify HAP sources affected by federal MACT standards.	Provide assistance with applicability determinations.	Provide EPA with best information on sources after each promulgation.	Ongoing
			For new/existing MACT's, ID & notify affected industry groups, provide DEQ contact to register as an emission source.	Existing: 6/30/98 New: 6 months after rule promulgation

	Identify sources of noncriteria pollutants that potentially may have emission in unhealthful or environmentally damaging quantities.		Develop list of point, area and mobile sources of concern.	June 30, 1998
D. Evaluate and quantify risk of HAP exposure	Create capability to evaluate risks (use toxicologist, develop procedures to determine acceptable risks)		No output for FY98	
	Determine or adopt a tool for initial screening of toxicity risk from HAP sources of emissions (use toxicologist, develop procedures to determine acceptable risks, etc.)		Screening procedure to identify significant point sources or source categories.	December 1997
	Using information collected under tactic A, B and C, evaluate and determine HAP risks by location and source.		No output for FY98.	
E. Adopt and implement federal HAP programs.	Carry out Oregon asbestos program.		Inspect 15% of asbestos projects.	NARS quarterly, Summary in end of year report.
			Provide asbestos analysis	Ongoing
	Incorporate federal MACT programs into Division 32 on a regular basis.		Update Div. 32 adoption by reference.	Annually
	Adopt area source NESHAPS		Incorporate area source NESHAPS into ACDP's or registration requirements.	October 1997
	Incorporate federal requirements into appropriate permit either ACDP or Title V.		Incorporate NESHAP's into TV permits, SM permits and ACDP's.	Ongoing

	Obtain delegation of federal HAP programs, including asbestos.		Submit 112(l) requests upon federal NESHAP's adoption. ³	Ongoing
	Update and implement NESHAP implementation agreement.	Work with state to update NESHAP implementation agreement.	Updated agreement	August 1997
	Carry out compliance and enforcement of federal HAP programs.		Develop a plan to focus attention on NESHAP compliance.	October 1997
			Review Title V semi-annual compliance certifications and inspections matrix for HAP's.	Ongoing
			Plan and carry out one coordinated statewide compliance verification for one NESHAP source category.	June 1998
			Perform inspections, write inspection reports, make ICE entries and compliance determinations under permit compliance review.	Ongoing

³Item used to evaluate national core performance measures for AQ.

	Implement 112(g) regulatory requirements for new and reconstructed major HAP sources.		Adopt final 112(g) rules and request approval. ⁴	Sept. 1997
			Incorporate case-by-case MACT standards in TV permits for new & reconstructed major HAP sources with no NESHAP. ⁴	Ongoing
	In conjunction with OR OSHA, OSP, and other DEQ programs, develop and implement 112(r) program.		Apply for EPA grant with state police to develop 112 (r) implementation plan.	April 1998
	Develop and carry out 112(k) federal urban area source toxics program.		Track federal rule development efforts.	Ongoing
	Develop and implement 112(f) federal risk program.		Track federal rule development efforts.	Ongoing
F. Adopt and implement state specific HAP programs.	Develop strategies to address high priority HAP concerns identified in tactics A through D above.		No output in FY98	
	Develop and adopt HAP programs to address HAP's and HAP sources not covered by NESHAP,(timing, risk, area sources, etc.).		Develop a plan and schedule for regulation of NESHAP non-majors.	November 1997

⁴Items use to evaluate National Core Performance measures for Air Quality.

	During Oregon's permitting process, develop and carry out procedures to address HAP issues not addressed by federal programs during Oregon's permitting process (information collection, risk identification, identification of need for controls and rulemaking to ensure controls are in place, etc.)		Conduct advisory committee process to develop procedures to ID and regulate significant HAP emissions subject to federal program.	June 1998
G. Develop and carry out HAP education and outreach programs.	Provide regulatory compliance assistance to affected sources.	Work with DEQ as appropriate to identify mechanisms for providing small business assistance on HAP's related issues/programs. Identify national, upcoming air toxics rules that impact small businesses, work with DEQ as appropriate on subsequent joint outreach efforts.	Complete NESHAP area source compliance special project.	Sept. 1997
	Provide small business assistance		As requested.	Ongoing
			Annual SBAP report to EPA.	Feb. 1998
	Provide emission reduction assistance, site audits and advice on pollution prevention.		Encourage and track pollution prevention.	Ongoing
	Develop and carry out communications plan to provide public information on HAP's and HAP regulatory requirements.		Develop plan.	April 1998

Objective 5: Maintain and Enhance (current baseline or better) aesthetic values of air quality.

This objective addresses public perception of “clean” air. It goes beyond human health to address quality of life values. This is our work with OC (welfare) and our ability to enjoy our surroundings (good visibility and no bad odors). This objective relates to the air quality goal of “High visibility air.”

TACTIC	DEQ ACTIVITY	EPA ACTIVITY	OUTPUT/ OUTCOME	DATE DUE
A. Characterize visibility and source contributions.	Continue existing visibility monitoring network in Class 1 areas and Columbia Gorge..		Collect neph. data, met data & visibility photos	June - Sept.
	Analyze visibility data		Publish visibility data in annual report.	Annual
	Identify all visibility impact areas in Oregon; Class 1 areas, Class 2 areas, Columbia Gorge, Willamette Valley, other wilderness and recreation areas and scenic vistas in urban areas (in addition to or beyond areas in existing federal visibility program).		No output in '98.	
B. Develop and improve effective visibility program	Comprehensive analysis of monitoring data collected under tactic A to determine effectiveness of visibility program.		Investigate funding to assist in analysis.	Summer '97
	Evaluate need for additional visibility protection and SIP revision.	Process visibility SIP.	Recommendations to revise visibility program. Advisory committee review of visibility SIP	1998
	Determine whether smoke management plans need revision.		Revise & update smoke management plans.	Spring '98

	Determine whether additional monitoring is needed.		Investigate funding for monitoring equipment.	Jan. '98
	Develop regional haze strategy once federal rules are adopted.	Disseminate regional haze rules once promulgated.	Adopt strategy including pollution prevention	EPA to set deadline.
C. Carry out visibility protection programs.	Coordinate visibility programs with other agencies (WDOE, federal land managers, local government, WESTAR, Grand Canyon, WGA, EPA, etc.).		Continue working with other agencies.	Ongoing
	Oversee administration of smoke management programs for agricultural burning and slash burning.		Work with OR. Dept. of Forestry and Ag. To protect NAAQS, visibility, and avoid nuisance.	Ongoing
			Review ambient monitoring data (including field burning and forest burning.)	Ongoing
	Carry out visibility program for point sources under PSD program.		Complete analysis as necessary.	Ongoing
D. Collect information and use to define nuisances, establish and improve regulatory requirements.	Define what constitutes nuisance and update nuisance program rules.		Investigate funding to revise nuisance rules .	Summer '97.

			Identify what specific nuisance situation the Department should regulate, and which ones are more suited to local government regulation. (Preparation for rule revision.)	June 30, 1998
	Comprehensively evaluate and update open burning program (Division 23).		Identify which open burning impacts AQ/public health, and which are more appropriately regulated locally as nuisance (preparation for rule revision)	Summer '98
E. Promote practices that reduce nuisances.	Carry out nuisance abatement strategies.		Collect nuisance impact data.	June 30, 1998
			Provide local governments with rules and model nuisance ordinance for use in responding to citizen complaints.	Dec. 31, 1997
	Carry out open burning programs.		Collect open burning impact data. Encourage alternatives to open burning, such as composting.	Ongoing.
F. Effectively respond to nuisance complaints	Improve and streamline complaint response procedures.		Better response to complaints.	Ongoing.

Objective 6: Reduce emissions whenever and wherever practical.

We want to capture the opportunities that exist to reduce emissions wherever possible including encouraging reductions beyond what regulatory standards are not sufficiently protective, or where we know that we can accomplish environmental gains through technical assistance or pollution the air quality program goal of “High visibility and no degradation in Oregon air.”

TACTIC	DEQ ACTIVITY	EPA ACTIVITY	OUTPUT/ OUTCOME	DUE DATE
A. Identify and prioritize opportunities for reducing emissions.	Identify and prioritize strategies for reducing emissions, including programs for PM2.5 and the 8 hr. Ozone standard.		Emission reduction strategies for Portland ozone.	Summer 1998
	Identify and prioritize strategies for reducing emissions including incentives, technical assistance, and regulatory programs.		Strategies that address both PM10 and 2.5 to be adopted in Medford SIP	May 1998
			Work with Portland Area Pollution prevention Outreach Team.	
	Evaluate need for and if appropriate develop an Oregon acid rain program.		No output in FY '98	
	Evaluate need for and if appropriate develop an Oregon stratospheric ozone protection program.		No output in FY '98	
	Evaluate need for and if appropriate develop a statewide program regulating motor fuel quality.		Find resources to evaluate need for motor vehicle fuel quality program.	July 1998
B. Provide incentives for behavioral changes and emission reductions through non-regulatory means.	Develop a recognition program for businesses and individuals.		No output in FY98	

	Develop and promote voluntary control programs, emission reduction programs and pollution prevention programs.		Implement Clean Air Action Days.	Ongoing
	Participate in cross program coordination efforts: green permit development, P2 core team and regional P2 teams, etc..		Develop agency framework and procedures for green permit issuance.	Jan. 1998
			Find potential pilot sources.	March 1998
C. Promote emission reductions through technical assistance and outreach.	Develop partnerships with industry, industry association groups and environmental groups to provide technical assistance.		Encourage and facilitate trade associations holding compliance workshops for their members.	Ongoing
	Work closely with local governments to compliment each other's emission reduction program.		Periodic meetings with local governments	Ongoing
	Provide emission reduction assistance site audits and advice on pollution prevention to small business.		Workshops, mailings, telephone contacts, etc .	Ongoing
			SBAP annual report.	Feb. 1998
	Provide technical assistance, regulatory information, rule distribution and information.		Mailings, fact sheets, amnesty programs, etc.	Ongoing
	Develop and carry out amnesty programs		Amnesty program results.	As appropriate

	Develop instructional programs through community colleges to certify environmental specialists for small businesses.		No output for FY98	
D. Achieve emission reductions through regulatory changes.	Evaluate opportunities for and if appropriate incorporate additional emission reduction strategies for mobile, area and point sources into rules.		Evaluate potential support for additional motor vehicle fuel requirements.	Feb. 1998

OBJECTIVE 7: Ensure system support for all AQ program objectives.

This objective directs the alignment of program structures and practices to support objectives. System support relates specifically to budgeting, training, planning, evaluation, prioritization, measurement, and several other activities. This objective relates to both air quality program goals of “High visibility and no degradation in Oregon air.”

TACTIC	DEQ ACTIVITY	EPA ACTIVITY	OUTPUT/ OUTCOME	DUE DATE
A. Provide staff training recognition	Budget for training	Provide needed staff training as resources allow.	Training budget (including allowance for AIRS conference)	Fall 1997
	Evaluate and provide for needed staff training and professional development		Training plan for each staff person	Dec. 1997
B. Improve information systems development and utilization.	Determine remaining program needs, complete development and fully populate ACSIS. Ensure consistency and compatibility with AIRS.	Provide support to ensure effective data collection, management, and submittal to EPA, through training, communication, and technical assistance.	Populate ACSIS	Ongoing

			Initiate work on ACSIS emissions tracking and revenue tracking	Spring 1998
			Keep ICE current	Ongoing
	Develop and maintain Information/communication Systems (LAN Administration, Information systems Development and Coordination, Telecommunications		Maintain current and consistent system across DEQ.	Ongoing
	Ensure effective data collection, management and submittal to EPA (EI, AFS, NARS, CEMs, AIRS)	Provide Assistance with AIRS	Provide complete up to date submittals	Ongoing
		Maintain the MACTRAX computer program for current control technology	See reference to MACTRAX in Objectives 1 and 2, Tactic C.	
		Maintain/improve database reporting and provide guidance	Provide staff training and incentives to utilize data systems	
	Develop time accounting system based on tactics.		Revise time sheets and work plans, implement electronic time reporting.	Oct. 1997
C. Conduct strategic planning and integrate into work	Continuously review, update and revise job descriptions/work plans/and work according to priorities		Revise work plans and job descriptions to reflect strategic planning process.	Jan. 1998

	Conduct periodic strategic planning, review priorities, review the Mission/Vision/Values/ Goals and integrate into budget and work plans	Conduct periodic strategic planning, review priorities, review the goals and integrate strategic plans.	Review strategic plan quarterly	Ongoing beginning in Dec. 1997
	Work with EPA to integrate the PPA with our strategic planning results	Work with DEQ to integrate the PPA with our strategic planning results.	Develop '99-2000 PPA integrated with strategic plan.	May 1998
D. Foster improved working relations within DEQ	Improve effective communication mechanisms between and among managers and staff (feed back loops)		Continue monthly managers meetings	Ongoing
			Monthly staff meetings.	Ongoing
	Define roles and responsibilities of all sections and divisions		Draft Air Quality Program Agreement	Fall 1997
	Develop an in-house dispute resolution process		Address in Air Quality Program Agreement	Dec. 1997
	Review and address job classification inequities		Determine scope of review	Spring 1998
E. Secure appropriate funding and administer effectively	Determine current expenditures in program areas.		Develop summary table of current expenditures by program area	Sept. 1997
	Identify funding needs for priority work (area source, HAPS monitoring, etc.)	Administer grants and contracts, etc..	Request federal special projects funding to evaluate funding alternatives.	Fall 1997
			Identify funding gap for implementing strategic plan.	Jan. 1998
	Evaluate alternatives and select appropriate options to obtain stable funding mechanisms		Identify funding options	March 1998

	Develop legislative proposals to implement funding mechanisms		Develop legislative concepts	April 1998
	Apply for grants and contracts		Apply for federal grant, base grant and special projects, ISTEA/CMAQ and others in accordance with priorities.	Ongoing
	Allocate and manage approved budgets by section		Seek upper management approval/decision to manage budgets by section.	Jan. 1998
F. Review and improve AQ organization and structure	Structure/organize AQ to support objectives		Draft new Air Quality Program Agreement	Fall 1997
	Review and adjust AQ organization and structure as needed		Implement new Air Quality Program Agreement	Dec. 1997
G. Continuously evaluate and improve program effectiveness for all objectives	Evaluate indirect source permit program and eliminate if appropriate		Rule revisions	Summer 1998
	Develop and track performance measures	Develop and track program specific performance measures.	Develop and track program specific performance measures.	Dec. 1997
	Develop and publish environmental indicators	Develop and publish environmental indicators	Develop and publish environmental indicators.	June 1998
	Assess program success in achieving performance measures and environmental indicators; and take necessary actions as defined by performance deficiencies.	Assess program success in achieving performance measures and environmental indicators.	Report on each published indicator.	Annually
			Update strategic plan to improve performance as needed	Ongoing

**LANE REGIONAL AIR POLLUTION AUTHORITY
PARTNERSHIP PLAN
7/1/97 TO 6/30/98**

PROGRAM OUTPUT

CO/O3

Continuing work is required to implement the maintenance strategies and EPA rules require a SIP revision in attainment areas for transportation conformity.

- Implement maintenance plan for the Eugene/Springfield area, which consists of review of CATS certifications by the City of Eugene, indirect source permitting, continued air quality monitoring — Ongoing
- Review conformity findings in transportation plans and TIPs, and continue to actively serve on technical advisory committees--Ongoing
- Update emissions inventories for CO, as needed--2nd quarter
- In cooperation with LCOG, develop CO SIP amendment to include new CATS and rule changes, as needed--2nd quarter

PM10

There are two PM₁₀ non-attainment areas in Lane County. Eugene/Springfield is a moderate area, without NAAQS violations for the last 10 years. Oakridge was named a moderate non-attainment area in December, 1993. The development of a maintenance plan for Eugene/Springfield will resume after waiting to see if the daily PM₁₀ standard is revised. Work will resume and follow the prescribed methodology for redesignation. The attainment plan for Oakridge will continue to be implemented.

- Continue to implement SIP strategy for Eugene/Springfield, consisting of a mandatory woodstove use advisory and curtailment program, including enhanced public information--Ongoing
- Complete and submit a maintenance plan for Eugene/Springfield to support request for redesignation as an attainment area for PM10--4th quarter.
- Implement attainment strategies in Oakridge, including the voluntary woodstove curtailment/enhanced public information/compliance survey program; support city ordinance for delayed mandatory curtailment; --2nd and 3rd quarters

- Develop a current emissions inventory--4th quarter
- Institute steps to maintain the emissions inventory--Ongoing

PERMITTING, ENFORCEMENT AND COMPLIANCE ASSURANCE

This program includes permitting, inspection, and review of specified reports filed by permitted facilities and all other regulated sources of air contamination; initiation of enforcement activity where violations occur, including non-permitted sources such as asbestos projects and open burning; and adjudication of contested cases. For significant violators, this program is largely carried out according to a compliance assurance agreement (CAAg) developed between EPA and LRAPA, according to federal policy guidance. Compliance status of significant violators is reported monthly, with review of progress on resolving each violation.

- Continue to operate ACDP and Title V programs for all permitted sources—ongoing
- Submit to EPA a list of scheduled inspections of significant sources—January, 1998
- Implement the CAAg (refer to CAAg for specific outputs)--Ongoing
- Report Significant Violators to EPA as required—ongoing
- Participate in training as available--Ongoing

ASBESTOS

The asbestos program involves inspection of asbestos abatement jobs for which prior notification to LRAPA is required. These include not only abatement performed at industrial and commercial sites, but small scale jobs as well. For those sources which are subject to the Title V Operating Permit Program, there are additional requirements such as prior notification to LRAPA of all demolition jobs not just those where asbestos is present.

- Inspect at least 15% of asbestos abatement projects for which notifications are received-Ongoing
- Inspect the asbestos disposal site at Short Mountain at least twice—quarters 2 and 4
- Continue to report asbestos activity to NARS--Ongoing
- Participate in training as available—Ongoing

MONITORING

Monitoring includes establishment, operation and maintenance of the SLAMS/NAMS network regular reporting of air quality and quality assurance data into the AIRS system. It also includes a continuous emission monitoring (CEM) quality assurance program. LRAPA reports all air quality and QA data to DEQ.

- Operate and maintain the SLAMS/NAMS network, per DEQ QA Manual—Ongoing
- With DEQ, conduct/submit annual report of review of network design, including each monitoring site classification, equipment--4th quarter
- With DEQ, prepare a monitoring strategy, including special projects, covering several years—Ongoing
- Coordinate network operations with DEQ--Ongoing
- Secure written approval prior to network revisions—Ongoing
- Operate a met network in support of special studies, woodburning advisories—as needed
- Submit quarterly air monitoring, meteorological and QA reports to DEQ within 60 days of the end of each calendar quarter—ongoing
- Submit quarterly report of data gaps as part of QA reports to DEQ within 60 days of the end of each calendar quarter--Ongoing
- Submit annual SLAMS summary report to DEQ in time for report to EPA--Ongoing
- Participate with DEQ and EPA to coordinate AIRS system maintenance--Ongoing
- Participate in instrument and systems audit with DEQ and EPA according to EPA system audit guidance--Ongoing
- Correct deficiencies identified in audits—as needed
- Audit major CEMs once each year or as needed—CGA audits initially, then RATA's as equipment is acquired--Ongoing
- Maintain daily PSI reporting in Eugene/Springfield--Ongoing
- Complete development of CEM audit capability, initiate auditing program--Ongoing
- Deploy PM2.5 monitoring sites, as required, in consultation with DEQ—as needed

NEW SOURCE REVIEW

New source review includes evaluation of air quality impacts of new and modified sources, assuring that all federal, state and local requirements are met, and that emissions from new and modified sources will not cause or contribute to NAAQS violations, and that PSD increments are not exceeded.

- Continue to implement NSR/PSD program--Ongoing
- Revise permits to correct discovered deficiencies—Ongoing
- Utilize top-down procedures to establish BACT—as needed
- Submit draft and final NSR permits to DEQ for review—as needed
- Participate as needed in NSR/PSD workshops—as available
- Update LRAPA NSR/PSD/PSEL rules after DEQ updates theirs—as needed

HAZARDOUS AIR POLLUTANTS

Oregon and LRAPA toxics program is patterned after the requirements of Title III, including implementation of MACT at affected sources. Rules to apply to new and modified non-major sources may be developed either as state rules or separate local rules. DEQ has applied for delegation of 112(1).

- Participate with DEQ to develop state rules for non-major sources of HAPs—Ongoing
- When delegation of 112(1) is given, implement federal HAPs program for Title V sources. Review new and modified sources of hazardous air pollutants and screen for air quality impact and further analysis—as needed
- Issue permits with appropriate conditions—as needed